

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DATE

FILED: 3/19/12

MONIQUE DA SILVA MOORE,
MARYELLEN O'DONOHUE, LAURIE
MAYERS, HEATHER PIERCE, and
KATHERINE WILKINSON, on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

PUBLICIS GROUPE SA and
MSLGROUP,

Defendants.

Case No. 11-cv-1279

STIPULATION AND ORDER
PURSUANT TO F.R.E. 502(d)
AND F.R.E. 502(e)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and
MSLGROUP Americas, Inc., sued herein as "MSLGROUP," by and through their undersigned
counsel, that:

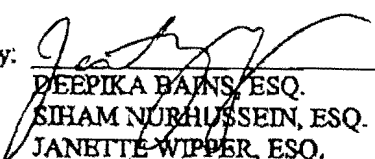
1. The protections afforded by the attorney-client privilege and work product doctrine shall not be waived by a party's disclosure of otherwise protected information in connection with the within litigation, unless such disclosure was made with the specific intention by the party to waive such protections as to the communication or document in question.
2. A party who produces any privileged document or communication, without the specific intention to waive such protections as to the document or communication in question, may, within ten days after the producing party actually discovers, through any source, that such inadvertent production occurred, notify the other party that such document or communication was inadvertently produced and should have been withheld as protected by the attorney-client privilege or work product doctrine. If such notice occurs, the production will not

constitute a waiver of the protections afforded by the attorney-client privilege and work product doctrine. Once the producing party provides such notice to the requesting party, the requesting party must promptly return the specified document or communication and any copies thereof and destroy any notes relating to same.


3. This Stipulation and Order supercedes and replaces the provisions contained in paragraph 22 of Stipulation And Order Regarding The Production Of Confidential Information executed by the parties and dated October 7, 2011.

4. Pending Court approval of this Stipulation and Order, the parties agree to abide by all of its terms, as if it had been approved by the Court.

By:


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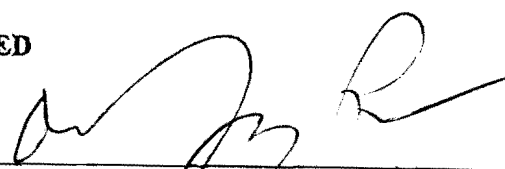

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Date: March 15, 2012

Date: March 19, 2012

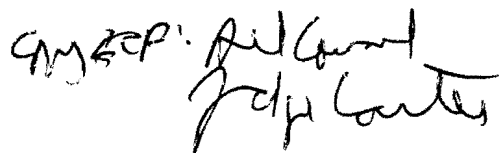
SO ORDERED

Date


Andrew J. Peck, U.S.M.J.

HON. ANDREW J. PECK
United States Magistrate Judge
Southern District of New York

BY ECF


JUDGE PECK